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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, et al. individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND  
[PROPOSED] ORDER RE: SUMMARY  
JUDGMENT BRIEFING SCHEDULE**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17<sup>th</sup> Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”)  
2 and Defendant Google LLC (“Google”), collectively, the “Parties”, submit this joint stipulation.

3 WHEREAS, on February 1, 2024, the Court issued a Further Case Management Scheduling  
4 Order setting deadlines for, among other things, the parties’ motions for summary judgment (Dkt.  
5 367);

6 WHEREAS, the February 1, 2024 Scheduling Order required Google to file its motion for  
7 summary judgment by March 28, 2024, and requires Plaintiffs to oppose Google’s motion and file  
8 any cross-motion by April 25, 2024;

9 WHEREAS, the February 1, 2024 Scheduling Order set a July 11, 2024 hearing for the  
10 parties’ summary judgment motions;

11 WHEREAS, on March 28, 2024, Google filed its motion for summary judgment (Dkt. 381);

12 WHEREAS, on March 29, 2024, the Parties were informed the Court is not available on July  
13 11, 2024, and Google was ordered to re-file its motion for summary judgment with a new hearing  
14 date;

15 WHEREAS, the Parties met and conferred and selected July 25 for the new hearing date,  
16 and Google re-filed its motion for summary judgment on April 4, 2024 (Dkt. 383);

17 WHEREAS, Plaintiffs have informed Google they do not plan to file a cross-motion for  
18 summary judgment;

19 WHEREAS, Plaintiffs have requested an additional week to oppose Google’s motion for  
20 summary judgment, and Google has agreed to this request;

21 WHEREAS, the Parties have agreed on a revised briefing schedule for Google’s motion for  
22 summary judgment;

23 WHEREAS, given Plaintiffs’ decision not to file a cross-motion, and given the new hearing  
24 date, this revised schedule leaves more time between the conclusion of briefing and the hearing date  
25 than the interval contemplated by the February 1, 2024 Case Management Order.

26 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the  
27 Parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that:

- 1 1. Plaintiffs' deadline to oppose Google's motion for summary judgment is extended one
- 2 week from April 25, 2024, to May 2, 2024.
- 3 2. Google's deadline to file any reply in support of its motion for summary judgment is
- 4 changed from May 23, 2024, to May 30, 2024.
- 5 3. The summary judgment hearing is scheduled for July 25, 2024.
- 6

7 A Proposed Order is submitted concurrently herewith.

8 IT IS SO STIPULATED.

9  
10 DATED: April 8, 2024

WILLKIE FARR & GALLAGHER, LLP

11 By: /s/ Benedict Y. Hur  
12 Benedict Y. Hur

13 *Attorneys for Defendant Google LLC*

14 DATED: April 8, 2024

BOIES SCHILLER FLEXNER LLP

15 By: /s/ Mark Mao  
16 Mark Mao

17 *Attorneys for Plaintiff*

**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: April 8, 2024

/s/ Mark Mao  
Mark Mao

Pursuant to Stipulation of the Parties, the Court revises the February 1, 2024, Further Case Management Order (Dkt. 36,7) as follows:

Event	Current Date	New Date
Plaintiffs' opposition to Google's motion for summary judgment	April 25	May 2
Google's reply in support of motion for summary judgment	May 23	May 30
Plaintiffs' reply in support of cross-motion for summary judgment	June 10	N/A
Summary judgment hearing	July 11	July 25

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Richard Seeborg